

FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

JUN 18 2013

SEAN F. McAVOY, CLERK  
DEPUTY  
SPOKANE, WASHINGTON

MICHAEL C. ORMSBY  
United States Attorney  
Eastern District of Washington  
Sean T. McLaughlin  
Assistant United States Attorney  
Post Office Box 1494  
Spokane, WA 99210-1494  
Telephone: (509) 353-2767

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

vs.

KIMBERLY LEE FAWVER,  
SARA M. MURPHY,

a/k/a "Sara Smith Cline,"  
a/k/a "Sara M. Halverson,"  
a/k/a "Sara L. Chatterson,"  
a/k/a "Lea L. Adams,"  
a/k/a "Mary H. Murphy,"  
a/k/a "Shalisha Brough,"

TONYA MARIE STEWART,

a/k/a "Tonya Skinner,"  
a/k/a "Tonya Burch,"  
a/k/a "Tonya Leland,"  
a/k/a "Tonya Selby,"  
a/k/a "Tonya Thomas,"

ERIC D. RANGEL,

DANIELLE CHRISTINE RANGEL,

CHRISTOPHER SCOTT BOUCK,

a/k/a "James M. Bouck,"

KAYLA JOY COSTELLO,

a/k/a "Kayla Joy Smith,"

AMY M. ALTONA,

STEVEN EDWIN BRONOWSKI,

a/k/a "Steven Bernowski,"

ANTHONY D. GARITONE,

PAMELA SUEANNE HAWKES,

ANTHONY R. GALLO,

PHILLIP E. THORN,

**CR-13-96-RHW**

INDICTMENT

Vio: 18 U.S.C. § 1349  
Conspiracy to Commit  
Bank Fraud  
(Count 1)

Vio: 18 U.S.C. § 1344  
Bank Fraud  
(Counts 2-63)

Vio: 18 U.S.C. § 1028A(a)(1)  
Aggravated Identity Theft  
(Counts 64-86)

Notice of Criminal  
Forfeiture Allegations

1 LAYLA MARIE HENDERSON,  
2 GARY DOUGLAS DIBBLE,  
3 a/k/a "Kevin J. Rupert,"  
4 CAMBREA M. BISHOP,  
5 DARYLE ROCHELLE WALLETTE,  
6 and  
SAMANTHA LAVELLE SMITH  
Defendants.

7 The Grand Jury charges that:

8 **GENERAL ALLEGATIONS**

9 At all times relevant and material to this Indictment

10 1. Sterling Savings Bank ("Sterling Savings") was a financial institution with  
11 offices located throughout the United States, including in the State of Washington, and  
12 whose accounts were insured by the Federal Deposit Insurance Corporation ("FDIC").

13 2. Numerica Credit Union was a financial institution with offices located in  
14 Washington State and Idaho, and whose accounts were insured by the National Credit  
15 Union Share Insurance Fund ("NCUSIF").

16 3. Global Credit Union was a financial institution with offices located in  
17 Washington State and Idaho, and whose accounts were insured by the National Credit  
18 Union Share Insurance Fund ("NCUSIF").

19 4. Fifth Third Bank was a financial institution with offices located throughout  
20 the United States, and whose accounts were FDIC insured.

21 5. Spokane Teacher's Credit Union ("STCU") was a financial institution with  
22 offices located in Washington State and Idaho, and whose accounts were NCUSIF  
23 insured.

24 6. RiverBank was a financial institution with offices located in Washington  
25 State, and whose accounts were FDIC insured.

26 7. Capital One Bank ("Capital One") was a financial institution with offices  
27 located throughout the United States, and whose accounts were FDIC insured.

1 8. Wells Fargo Bank ("Wells Fargo") was a financial institution with offices  
2 located throughout the United States, including Washington State, and whose accounts  
3 were FDIC insured.

4 9. Washington Trust Bank ("WTB") was a financial institution with offices  
5 located throughout the United States, including Washington State, and whose accounts  
6 were FDIC insured.

7 10. U.S. Bank of Idaho was a financial institution with offices located in Idaho,  
8 and whose accounts were FDIC insured.

9 11. U.S. Bank was a financial institution with offices located throughout the  
10 United States, including Washington State, and whose accounts were FDIC insured.

11 12. Panhandle State Bank ("PSB") was a financial institution with offices  
12 located in Washington State and Idaho, and whose accounts were FDIC insured.

13 13. Mountain West Bank ("Mountain West") was a financial institution with  
14 offices located throughout the United States, including Washington State, and whose  
15 accounts were FDIC insured.

16 14. American West Bank ("American West") was a financial institution with  
17 offices located throughout the United States, including Washington State, and whose  
18 accounts were FDIC insured.

19 15. Chase Bank was a financial institution with offices located throughout the  
20 United States, including Washington State, and whose accounts were FDIC insured.

21 16. Bank of America ("BoA") was a financial institution with offices located  
22 throughout the United States, including Washington State, and whose accounts were  
23 FDIC insured.

24 17. Washington Mutual Bank ("WAMU") was a financial institution with  
25 offices located throughout the United States, including Washington State, and whose  
26 accounts were FDIC insured.

1 18. Inland Northwest Bank was a financial institution with offices located in  
2 Washington State and Idaho, and whose accounts were FDIC insured.

3 19. First Premier Bank was a financial institution with offices located in South  
4 Dakota, and whose accounts were FDIC insured.

5 20. The term "financial institutions" refers collectively to the entities set forth in  
6 the preceding paragraphs 1 through 19.

7 21. Defendant KIMBERLY LEE FAWVER was an individual who resided in  
8 Spokane County, Washington.

9 22. Defendant SARA M. MURPHY was an individual who resided in Spokane  
10 County, Washington.

11 23. Defendant TONYA MARIE STEWART was an individual who resided in  
12 Spokane County, Washington.

13 24. Defendant ERIC D. RANGEL was an individual who resided in Spokane  
14 County, Washington.

15 25. Defendant DANIELLE CHRISTINE RANGEL, an individual who resided  
16 in Spokane County, Washington, was the spouse of ERIC D. RANGEL.

17 26. Defendant CHRISTOPHER SCOTT BOUCK was an individual who resided  
18 in Spokane County, Washington.

19 27. Defendant KAYLA JOY COSTELLO was an individual who resided in  
20 Spokane County, Washington.

21 28. Defendant AMY M. ALTONA was an individual who resided in Spokane  
22 County, Washington.

23 29. Defendant STEVEN EDWIN BRONOWSKI was an individual who resided  
24 in Spokane County, Washington.

25 30. Defendant ANTHONY D. GARITONE was an individual who resided in  
26 Spokane County, Washington.

31. Defendant PAMELA SUEANNE HAWKES was an individual who resided in Spokane County, Washington.

32. Defendant ANTHONY R. GALLO was an individual who resided in Spokane County, Washington.

33. Defendant PHILLIP E. THORN was an individual who resided in Spokane County, Washington.

34. Defendant LAYLA MARIE HENDERSON was an individual who resided in Spokane County, Washington.

35. Defendant GARY DOUGLAS DIBBLE was an individual who resided in Spokane County, Washington.

36. Defendant CAMBREA M. BISHOP was an individual who resided in Spokane County, Washington.

37. Defendant DARYLE ROCHELLE WALLETTE was an individual who resided in Spokane County, Washington.

38. Defendant SAMANTHA LAVELLE SMITH was an individual who resided in Spokane County, Washington.

39. The term "real person victims" refers collectively to individuals, including those identified below by initials and residence, whose bank account data, means of identification, and other personal identifying information was possessed, transferred, and utilized without lawful authority.

<u>NAME</u>	<u>RESIDENCE</u>
L.N.N. a/k/a L.N.M.	Deer Park, WA
T.J.S.	Spokane, WA
J.R.P.	Spokane, WA
A.T.H.	Spokane, WA
M.M.	Spokane, WA



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

<u>NAME</u>	<u>RESIDENCE</u>
E.A.	Spokane, WA
M.M.C.	Spokane, WA
J.S.	Spokane, WA
C.A.	Bothell, WA
E.E.H.	Spokane, WA
K.M.C.	Spokane, WA
S.E.A.	Spokane, WA
C.M.F.	Spokane, WA
A.R.B.	Redmond, WA
M.N.P.	Spokane, WA
A.G.	Spokane, WA
J.G.	Spokane, WA
J.C.R.	Spokane, WA
C.L.S.	Rockford, WA
T.A.J.	Spokane, WA
F.C.	Spokane, WA
M.H.C.	Spokane, WA
J.N.	Newman Lake, WA
M.C.	Spokane, WA
L.S.	Spokane, WA
N.F.	Spokane, WA
C.T.	Spokane, WA
P.B.	Spokane, WA
S.L.D.	Newman Lake, WA
H.C.T.	Spokane, WA
Y.F.	Spokane, WA
J.W.	Medical Lake, WA

<u>NAME</u>	<u>RESIDENCE</u>
C.P.	Elk, WA
L.H.	Nine Mile Falls, WA
J.F.	Spokane, WA

40. The term “organizational victims” refers collectively to the entities, including those identified below by name and location, whose bank account data and other identifying organizational and employee information was possessed, transferred, and utilized without lawful authority.

<u>NAME</u>	<u>LOCATION</u>
Safety Services Inc.	Spokane, WA
Park Center Building LLC	Spokane, WA
Camtek Inc.	Spokane, WA
DataPro Solutions	Spokane, WA
McCathren Management	Spokane, WA
Panhandle State Bank	Sandpoint, ID
SPH Controls	Spokane, WA
Kaestner Electric Inc.	Dalton Springs, ID
Henkels Holding Ltd.	Hayden, ID
E.WA Chapter IAEI	Nine Mile Falls, WA
G&L Enterprise	Spokane, WA
Rockwood Clinic	Spokane, WA
Group Photographers Association	Spokane, WA
Marlin Windows Inc.	Spokane, WA
Genesis Financial	Spokane, WA

**COUNT 1**

**CONSPIRACY TO COMMIT BANK FRAUD**

**(18 U.S.C. § 1349)**

1. Paragraphs 1-40 of the General Allegations section of this Indictment are re-alleged and fully incorporated herein by reference.

2. From in and around June 2012 and continuing through in and around December 2012, the exact dates being unknown to the Grand Jury, in the Eastern District of Washington, and elsewhere, defendants KIMBERLY LEE FAWVER, SARA M. MURPHY, TONYA MARIE STEWART, ERIC D. RANGEL, DANIELLE CHRISTINE RANGEL, CHRISTOPHER SCOTT BOUCK, KAYLA JOY COSTELLO, AMY M. ALTONA, STEVEN EDWIN BRONOWSKI, ANTHONY D. GARITONE, PAMELA SUEANNE HAWKES, ANTHONY R. GALLO, PHILLIP E. THORN, LAYLA MARIE HENDERSON, GARY DOUGLAS DIBBLE, CAMBREA M. BISHOP, DARYLE ROCHELLE WALLETTTE, and SAMANTHA LAVELLE SMITH, did willfully, that is, with the intent to further the objects of the conspiracy, and knowingly combine, conspire, confederate, and agree together and with others known and unknown to the Grand Jury to knowingly and with intent to defraud, execute and cause the execution of a scheme and artifice to defraud one or more financial institutions, as defined by 18 U.S.C. § 20, which scheme and artifice would employ material falsehoods, and to knowingly and with intent to defraud, execute, and cause the execution of a scheme and artifice to obtain moneys, funds, credits, assets, and other property owned by, and under the custody and control of one or more said financial institutions, by means of false and fraudulent pretenses, representations, and promises relating to a material fact, in violation of 18 U.S.C. §§ 1344(1) and (2); and

**PURPOSE OF THE CONSPIRACY**

3. It was the purpose of the conspiracy for the defendants and their co-conspirators to unlawfully enrich themselves by, among other things: (a) unlawfully obtaining, via theft, burglary, and other means, financial institution account data and



1 other identifying information of real person and organizational victims; (b) creating  
2 counterfeit checks, utilizing financial institution account and routing data and other  
3 identifying information of real person and organizational victims, materially  
4 misrepresenting authorized payments to the defendants, co-conspirators, and others; (c)  
5 recruiting and utilizing check runners to negotiate the counterfeit checks at various  
6 locations and return the proceeds to be divided amongst the participants; (d) causing the  
7 counterfeit checks to be presented for payment by the financial institutions based on the  
8 material misrepresentations; (e) unlawfully utilizing means of identification of real  
9 person victims and others, in order to conceal the defendants' and co-conspirators'  
10 involvement in the fraud scheme; and (f) diverting the fraud proceeds for their personal  
11 use and benefit, all to further the fraud scheme.

#### 12 MANNER AND MEANS OF CONSPIRACY

13 The manner and means by which the defendants and their co-conspirators sought  
14 to accomplish the objects and purpose of the conspiracy included, among others, the  
15 following:

#### 16 F.C. and M.H.C.

17 4. Beginning in and around September 2012, ERIC D. RANGEL, DANIELLE  
18 CHRISTINE RANGEL, ANTHONY D. GARITONE, and other co-conspirators  
19 unlawfully obtained Sterling Savings account information, including other means of  
20 identification, of F.C. and M.H.C. Thereafter, they falsely and fraudulently created, and  
21 caused to be created, Sterling Savings checks for their own use and benefit.

22 5. On or about September 11, 2012, ANTHONY D. GARITONE opened an  
23 account at Numerica Credit Union in Airway Heights, WA. Beginning that same day and  
24 continuing through on or about September 12, 2012, ANTHONY D. GARITONE  
25 negotiated, and caused to be negotiated, (5) counterfeit Sterling Savings checks, totaling  
26 \$3,250.00, at various Numerica Credit Union and Global Credit Union locations in and  
27 around Spokane, WA. Among other material misrepresentations, ANTHONY D.  
28 GARITONE utilized Sterling Savings account information (xxxx-1241), including

1 M.H.C.'s name, address, and forged signature, to falsely and fraudulently represent that  
2 payment was authorized.

3 Rockwood Clinic, J.N., and M.C.

4 6. Beginning in and around September 2012, ERIC D. RANGEL, DANIELLE  
5 CHRISTINE RANGEL, and ANTHONY D. GARITONE unlawfully obtained Fifth  
6 Third Bank account information of Rockwood Clinic, including means of identification  
7 of J.N. and M.C. On or about September 14, 2012, DANIELLE CHRISTINE RANGEL  
8 and ANTHONY D. GARITONE falsely and fraudulently negotiated, and caused to be  
9 negotiated, a Fifth Third Bank check, totaling \$1,387.00 (#272436), at Numerica Credit  
10 Union in Spokane, WA. Among other material misrepresentations, DANIELLE  
11 CHRISTINE RANGEL and ANTHONY D. GARITONE utilized Fifth Third Bank  
12 account information (xxxx-5780), including J.N.'s name, address, and forged signature,  
13 to falsely and fraudulently represent that the payment was authorized.

14 7. On or about September 18, 2012, ERIC D. RANGEL and ANTHONY D.  
15 GARITONE falsely and fraudulently attempted to negotiate another Fifth Third Bank  
16 check at Numerica Credit Union in Spokane, WA. Among other material  
17 misrepresentations, ERIC D. RANGEL and ANTHONY D. GARITONE utilized Fifth  
18 Third Bank account information (xxxx-5780), including M.C.'s name and address, to  
19 falsely and fraudulently represent that payment was authorized.

20 McCathren Management

21 8. Beginning in and around September 2012, KIMBERLY LEE FAWVER,  
22 SAMANTHA LAVELLE SMITH, and other co-conspirators unlawfully obtained  
23 RiverBank account information of McCathren Management. Thereafter, they falsely and  
24 fraudulently created, and caused to be created, counterfeit Riverbank checks for their own  
25 use and benefit.

26 9. On or about September 28, 2012, SAMANTHA LAVELLE SMITH falsely  
27 and fraudulently negotiated, and caused to be negotiated, one (1) counterfeit Riverbank  
28 check, totaling \$168.49 (#1411), at STCU in Spokane, WA. Among other material  
misrepresentations, KIMBERLY LEE FAWVER and SAMANTHA LAVELLE SMITH

utilized Riverbank account information (xxxx-1364) to falsely and fraudulently represent that payment was authorized.

Camtek Inc. and L.S.

10. Beginning in and around September 2012, KIMBERLY LEE FAWVER, TONYA MARIE STEWART, and other co-conspirators unlawfully obtained Capital One Bank account information of Camtek Inc., including means of identification of L.S. Thereafter, they falsely and fraudulently created, and caused to be created, counterfeit Capital One Bank checks for their own use and benefit.

11. On or about September 26, 2012, TONYA MARIE STEWART falsely and fraudulently negotiated, and caused to be negotiated, one (1) counterfeit Capital One Bank check, totaling \$450.00 (#12770), at Chase Bank in Spokane, WA. Among other material misrepresentations, KIMBERLY LEE FAWVER and TONYA MARIE STEWART utilized Capital One Bank account information (xxxx-2848), including L.S.'s name and forged signature, to falsely and fraudulently represent that payment was authorized.

Group Photographers Association, N.F., and J.S.

12. Beginning in and around June 2012, KIMBERLY LEE FAWVER, ERIC D. RANGEL, DANIELLE CHRISTINE RANGEL, CHRISTOPHER SCOTT BOUCK, KAYLA JOY COSTELLO, and other co-conspirators unlawfully obtained WTB account information of Group Photographers Association, including means of identification of J.S. and N.F. Thereafter, they falsely and fraudulently created, and caused to be created, counterfeit WTB checks for their own use and benefit.

13. On or about October 5, 2012, KAYLA JOY COSTELLO falsely and fraudulently negotiated, and caused to be negotiated, a counterfeit WTB check, totaling \$1,100.00 (#100565), at WTB in Spokane, WA. Among other material misrepresentations, KAYLA JOY COSTELLO utilized WTB account information (xxxx-3227), including N.F.'s name, address, Washington State identification/driver's license number, and forged signature, to falsely and fraudulently represent that payment was authorized.

1       14. On or about October 5, 2012, ERIC D. RANGEL falsely and fraudulently  
2 negotiated, and caused to be negotiated, a counterfeit WTB check, totaling \$1,100.00  
3 (#100581), in and around Spokane, WA. Among other material misrepresentations,  
4 ERIC D. RANGEL utilized WTB account information (xxxx-3227) to falsely and  
5 fraudulently represent that payment was authorized. That same day, ERIC D. RANGEL  
6 falsely and fraudulently negotiated, and caused to be negotiated, another counterfeit  
7 WTB check, totaling \$1,008.15 (#100562), in Spokane, WA. Among other material  
8 misrepresentations, ERIC D. RANGEL utilized WTB account information (xxxx-3227)  
9 to falsely and fraudulently represent that payment was authorized.

10       15. On or about October 6, 2012, ERIC D. RANGEL and CHRISTOPHER  
11 SCOTT BOUCK falsely and fraudulently negotiated, and caused to be negotiated, a  
12 counterfeit WTB check, totaling \$800.00 (#365), in and around Spokane, WA. Among  
13 other material misrepresentations, ERIC D. RANGEL and CHRISTOPHER SCOTT  
14 BOUCK utilized WTB account information (xxxx-3227), including J.S.'s name, address,  
15 and forged signature, to falsely and fraudulently represent that payment was authorized.

16                   Kaestner Electric Inc. and C.T.

17       16. Beginning in and around October 2012, KIMBERLY LEE FAWVER, ERIC  
18 D. RANGEL, DANIELLE CHRISTINE RANGEL, and other co-conspirators unlawfully  
19 obtained U.S. Bank of Idaho account information of Kaestner Electric Inc., including  
20 means of identification of C.T. Thereafter, they falsely and fraudulently created, and  
21 caused to be created, counterfeit U.S. Bank of Idaho checks for their own use and benefit.

22       17. From on or about October 9, 2012, continuing through October 11, 2012,  
23 ERIC D. RANGEL and other co-conspirators falsely and fraudulently negotiated,  
24 attempted to negotiate, and caused to be negotiated, nine (9) counterfeit U.S. Bank of  
25 Idaho checks, totaling \$3,708.15 (#28439, #28440, #28447, #28448, #28451, #28454,  
26 #28455, #28457, #28458), in and around Spokane, WA. Among other material  
27 misrepresentations, ERIC D. RANGEL and other co-conspirators utilized U.S. Bank of  
28 Idaho account information (xxxx-5684), including C.T.'s name, address, Washington

1 State identification/driver's license number, and forged signature, to falsely and  
2 fraudulently represent that the payment was authorized.

3 Marlin Windows Inc. and J.S.

4 18. Beginning in and around October 2012, ERIC D. RANGEL, DANIELLE  
5 CHRISTINE RANGEL, ANTHONY R. GALLO, LAYLA MARIE HENDERSON, and  
6 other co-conspirators unlawfully obtained WTB account information of Marlin Windows  
7 Inc., including means of identification of J.S. Thereafter, they falsely and fraudulently  
8 created, and caused to be created, counterfeit WTB checks for their own use and benefit.

9 19. On or about October 11, 2012, ANTHONY R. GALLO falsely and  
10 fraudulently negotiated, and caused to be negotiated, a counterfeit WTB check, totaling  
11 \$492.34 (#53220), in and around Spokane, WA. Among other material  
12 misrepresentations, ANTHONY R. GALLO utilized WTB account information (xxxx-  
13 6595), including J.S.'s name, address, Washington State identification/driver's license  
14 number, and forged signature, to falsely and fraudulently represent that payment was  
15 authorized.

16 20. On or about October 11, 2012, LAYLA MARIE HENDERSON falsely and  
17 fraudulently negotiated, and caused to be negotiated, a counterfeit WTB check, totaling  
18 \$536.00 (#21002), in and around Spokane, WA. Among other material  
19 misrepresentations, LAYLA MARIE HENDERSON utilized WTB account information  
20 (xxxx-9455) to falsely and fraudulently represent that payment was authorized. On or  
21 about October 13, 2012, LAYLA MARIE HENDERSON falsely and fraudulently  
22 negotiated, and caused to be negotiated, another counterfeit WTB check, totaling \$250.00  
23 (#53228), in Spokane, WA. Among other material misrepresentations, LAYLA MARIE  
24 HENDERSON utilized WTB account information (xxxx-6595) to falsely and  
25 fraudulently represent that payment was authorized.

26 Park Center Building LLC and J.S.

27 21. Beginning in and around October 2012, KIMBERLY LEE FAWVER,  
28 SARA M. MURPHY, TONYA MARIE STEWART, CAMBREA M. BISHOP,  
DARYLE ROCHELLE WALLETTE, and other co-conspirators unlawfully obtained

1 WTB account information of Park Center Building LLC, including means of  
2 identification of J.S. Thereafter, they falsely and fraudulently created, and caused to be  
3 created, counterfeit WTB checks for their own use and benefit.

4 22. On or about October 11, 2012, SARA M. MURPHY falsely and fraudulently  
5 negotiated, and caused to be negotiated, a counterfeit WTB check, totaling \$250.00  
6 (#421057393), in and around Spokane, WA. Among other material misrepresentations,  
7 SARA M. MURPHY falsely and fraudulently utilized WTB account information (xxxx-  
8 9205), including a bogus "Sara Smith Cline" Washington State identification number, to  
9 falsely and fraudulently represent that payment was authorized.

10 23. On or about October 12, 2012, DARYLE ROCHELLE WALLETTE falsely  
11 and fraudulently negotiated, and caused to be negotiated, a counterfeit WTB check,  
12 totaling \$150.00 (#342105748), in and around Spokane, WA. Among other material  
13 misrepresentations, DARYLE ROCHELLE WALLETTE falsely and fraudulently  
14 utilized WTB account information (xxxx-9205) to falsely and fraudulently represent that  
15 payment was authorized.

16 24. On or about October 14, 2012, TONYA MARIE STEWART falsely and  
17 fraudulently negotiated, and caused to be negotiated, a counterfeit WTB check, totaling  
18 \$150.00 (#342105742), in and around Spokane, WA. Among other material  
19 misrepresentations, TONYA MARIE STEWART falsely and fraudulently utilized WTB  
20 account information (xxxx-9205) to falsely and fraudulently represent that payment was  
21 authorized.

22 25. On or about October 15, 2012, CAMBREA M. BISHOP falsely and  
23 fraudulently negotiated, and caused to be negotiated, a counterfeit WTB check, totaling  
24 \$515.36 (#51028), in and around Spokane, WA. Among other material  
25 misrepresentations, CAMBREA M. BISHOP falsely and fraudulently utilized WTB  
26 account information (xxxx-9205) to falsely and fraudulently represent that payment was  
27 authorized.



P.B.

26. Beginning in and around October 2012, SARA M. MURPHY, TONYA MARIE STEWART, and other co-conspirators unlawfully obtained Wells Fargo account information, including means of identification, of P.B. Thereafter, they falsely and fraudulently created, and caused to be created, counterfeit Wells Fargo checks for their own use and benefit.

27. From on or about October 17, 2012, continuing through on or about October 19, 2012, TONYA MARIE STEWART falsely and fraudulently negotiated, and caused to be negotiated, four (4) counterfeit Wells Fargo checks, totaling \$369.35 (#4132, #4136, #4139, #4142), in and around Spokane, WA. Among other material misrepresentations, TONYA MARIE STEWART utilized Wells Fargo account information (xxxx-6176), including P.B.'s name and address, to falsely and fraudulently represent that payment was authorized.

28. On or about October 19, 2012, SARA M. MURPHY falsely and fraudulently negotiated, and caused to be negotiated, two (2) counterfeit Wells Fargo checks, totaling \$243.38 (#4144, #4149), in and around Spokane, WA. Among other material misrepresentations, TONYA MARIE STEWART utilized Wells Fargo account information (xxxx-6176), including P.B.'s name and address, to falsely and fraudulently represent that payment was authorized.

S.L.D.

29. Beginning in and around October 2012, SARA M. MURPHY, TONYA MARIE STEWART, PHILLIP E. THORN, and other co-conspirators unlawfully obtained U.S. Bank account information, including means of identification, of S.L.D. Thereafter, they falsely and fraudulently created, and caused to be created, counterfeit U.S. Bank checks for their own use and benefit.

30. From on or about October 21, 2012, continuing through on or about October 22, 2012, SARA M. MURPHY falsely and fraudulently negotiated, and caused to be negotiated, eight (8) counterfeit U.S. Bank checks, totaling \$564.33 (#6432, #6436, #6437, #6438, #6439, #6449, #6454, #6467), in and around Spokane, WA. Among other

1 material misrepresentations, SARA M. MURPHY utilized U.S. Bank account  
2 information (xxxx-4552) to falsely and fraudulently represent that payment was  
3 authorized.

4 31. On or about October 23, 2012, PHILLIP E. THORN falsely and fraudulently  
5 negotiated, and caused to be negotiated, a counterfeit U.S. Bank check, totaling \$350.00  
6 (#6397), in and around Spokane, WA. Among other material misrepresentations,  
7 PHILLIP E. THORN utilized U.S. Bank account information (xxxx-4552), including  
8 S.L.D.'s name, address, and date of birth, to falsely and fraudulently represent that  
9 payment was authorized.

10 32. On or about October 24, 2012, TONYA MARIE STEWART falsely and  
11 fraudulently negotiated, and caused to be negotiated, a counterfeit U.S. Bank check,  
12 totaling \$61.29 (#6396), in and around Spokane, WA. Among other material  
13 misrepresentations, TONYA MARIE STEWART utilized U.S. Bank account information  
14 (xxxx-4552), including S.L.D.'s name, address, and date of birth, to falsely and  
15 fraudulently represent that payment was authorized.

16 H.C.T.

17 33. Beginning in and around September 2012, SARA M. MURPHY, TONYA  
18 MARIE STEWART, GARY DOUGLAS DIBBLE, and other co-conspirators unlawfully  
19 obtained Panhandle State Bank account information, including means of identification, of  
20 H.C.T. Thereafter, they falsely and fraudulently created, and caused to be created,  
21 counterfeit Panhandle State Bank checks for their own use and benefit.

22 34. On or about October 21, 2012, TONYA MARIE STEWART falsely and  
23 fraudulently negotiated, and caused to be negotiated, two (2) counterfeit Panhandle State  
24 Bank checks, totaling \$128.50 (#1057, #1059), in and around Spokane, WA. Among  
25 other material misrepresentations, TONYA MARIE STEWART utilized Panhandle State  
26 Bank account information (xxxx-6966), including H.C.T.'s name and address, to falsely  
27 and fraudulently represent that payment was authorized.

28 35. On or about October 21, 2012, GARY DOUGLAS DIBBLE falsely and  
fraudulently negotiated, and caused to be negotiated, a counterfeit Panhandle State Bank

1 check, totaling \$59.19 (#1124), in and around Spokane, WA. Among other material  
2 misrepresentations, GARY DOUGLAS DIBBLE utilized Panhandle State Bank account  
3 information (xxxx-6966), including H.C.T.'s name and address, to falsely and  
4 fraudulently represent that payment was authorized.

5 Y.F. and J.W.

6 36. Beginning in and around October 2012, KIMBERLY LEE FAWVER,  
7 PAMELA SUEANNE HAWKES, and other co-conspirators unlawfully obtained BoA  
8 and Mountain West Bank account information, including means of identification, of Y.F.  
9 and J.W. Thereafter, they falsely and fraudulently created, and caused to be created,  
10 counterfeit BoA and Mountain West Bank checks for their own use and benefit.

11 37. On or about October 29, 2012, KIMBERLY LEE FAWVER falsely and  
12 fraudulently negotiated, and caused to be negotiated, a counterfeit Mountain West Bank  
13 check, totaling \$41.27 (#28440), in and around Spokane, WA. Among other material  
14 misrepresentations, KIMBERLY LEE FAWVER utilized Mountain West Bank account  
15 information (xxxx-9632), including J.W.'s name, Washington State  
16 identification/driver's license number, and forged signature, to falsely and fraudulently  
17 represent that payment was authorized.

18 38. From on or about November 18, 2012, continuing through on or about  
19 November 23, 2012, PAMELA SUEANNE HAWKES falsely and fraudulently  
20 negotiated, and caused to be negotiated, five (5) counterfeit Panhandle State Bank  
21 checks, totaling \$1,979.00 (#4689, #4691, #4693, #4694, #4695), in and around Spokane,  
22 WA. Among other material misrepresentations, PAMELA SUEANNE HAWKES  
23 utilized BoA and Mountain West Bank account information (xxxx-9632) to falsely and  
24 fraudulently represent that payment was authorized.

25 Panhandle State Bank

26 39. Beginning in and around October 2012, KIMBERLY LEE FAWVER,  
27 STEVEN EDWIN BRONOWSKI, and other co-conspirators unlawfully obtained  
28 Panhandle State Bank account information. Thereafter, they falsely and fraudulently

1 created, and caused to be created, counterfeit Panhandle State Bank checks for their own  
2 use and benefit.

3 40. On or about October 29, 2012, STEVEN EDWIN BRONOWSKI falsely and  
4 fraudulently negotiated, and caused to be negotiated, two (2) counterfeit Panhandle State  
5 Bank checks, totaling \$887.00 (#87434, #87438), in and around Spokane, WA, and Post  
6 Falls, ID. Among other material misrepresentations, STEVEN EDWIN BRONOWSKI  
7 utilized Panhandle State Bank account information (xxxx-0083) to falsely and  
8 fraudulently represent that payment was authorized.

9 C.P. and N.F.

10 41. Beginning in and around November 2012, KAYLA JOY COSTELLO and  
11 other co-conspirators unlawfully obtained American West Bank account information,  
12 including means of identification, of C.P. and N.F. Thereafter, they falsely and  
13 fraudulently created, and caused to be created, counterfeit American West Bank checks  
14 for their own use and benefit.

15 42. From on or about November 3, 2012, continuing through on or about  
16 November 5, 2012, KAYLA JOY COSTELLO falsely and fraudulently attempted to  
17 negotiate two (2) counterfeit American West Bank checks, totaling \$975.00 (#1043,  
18 #1080), at Wells Fargo in Spokane, WA. Among other material misrepresentations,  
19 KAYLA JOY COSTELLO utilized American West Bank account information (xxxx-  
20 1268), including C.P.'s name, address, and forged signature and N.F.'s name and  
21 Washington State identification/driver's license, to falsely and fraudulently represent that  
22 payment was authorized.

23 E.WA Chapter IAEI and L.H.

24 43. Beginning in and around November 2012, KIMBERLY LEE FAWVER,  
25 PAMELA SUEANNE HAWKES, and other co-conspirators unlawfully obtained WTB  
26 account information, including means of identification, of the Eastern Washington  
27 Chapter of the International Association of Electrical Inspectors ("E.WA Chapter IAEI")  
28

1 and L.H. Thereafter, they falsely and fraudulently created, and caused to be created,  
2 counterfeit WTB checks for their own use and benefit.

3 44. On or about November 15, 2012, PAMELA SUEANNE HAWKES falsely  
4 and fraudulently negotiated, and caused to be negotiated, a counterfeit WTB check,  
5 totaling \$850.00 (#1549), at WTB in Spokane, WA. Among other material  
6 misrepresentations, PAMELA SUEANNE HAWKES utilized WTB account information  
7 (xxxx-4964), including L.H.'s name and forged signature, to falsely and fraudulently  
8 represent that payment was authorized.

9 Genesis Financial

10 45. Beginning in and around November 2012, ERIC D. RANGEL, DANIELLE  
11 CHRISTINE RANGEL, AMY M. ALTONA, ANTHONY D. GARITONE, and other co-  
12 conspirators unlawfully obtained Riverbank account information of Genesis Financial.  
13 Thereafter, they falsely and fraudulently created, and caused to be created, counterfeit  
14 Riverbank checks for their own use and benefit.

15 46. From on or about November 19, 2012, continuing through November 21,  
16 2012, DANIELLE CHRISTINE RANGEL and AMY M. ALTONA falsely and  
17 fraudulently negotiated, and caused to be negotiated, eight (8) counterfeit Riverbank  
18 checks, totaling \$1497.19 (#10219, #10220, #10222, #10224, #10226, #10233, #10235,  
19 #10236), in and around Spokane, WA. Among other material misrepresentations,  
20 DANIELLE CHRISTINE RANGEL and AMY M. ALTONA utilized Riverbank account  
21 information (xxxx-0124) to falsely and fraudulently represent that payment was  
22 authorized.

23 47. From on or about November 20, 2012, continuing through November 21,  
24 2012, ERIC D. RANGEL, DANIELLE CHRISTINE RANGEL, AMY M. ALTONA,  
25 and ANTHONY D. GARITONE falsely and fraudulently negotiated, and caused to be  
26 negotiated, three (3) counterfeit Riverbank checks, totaling \$828.24 (#10229, #10231,  
27 #10232), in and around Spokane, WA. Among other material misrepresentations, ERIC  
28 D. RANGEL, DANIELLE CHRISTINE RANGEL, AMY M. ALTONA, and

1 ANTHONY D. GARITONE ALTONA utilized Riverbank account information (xxxx-  
2 0124) to falsely and fraudulently represent that payment was authorized.

3 SPH Controls

4 48. Beginning in and around November 2012, KIMBERLY LEE FAWVER,  
5 PAMELA SUEANNE HAWKES, and other co-conspirators unlawfully obtained WTB  
6 account information of SPH Controls. Thereafter, they falsely and fraudulently created,  
7 and caused to be created, counterfeit WTB checks for their own use and benefit.

8 49. From on or about November 8, 2012, continuing through November 29,  
9 2012, PAMELA SUEANNE HAWKES falsely and fraudulently attempted to negotiate a  
10 counterfeit WTB check, totaling \$565.90 (#31009), in and around Spokane, WA. Among  
11 other material misrepresentations, PAMELA SUEANNE HAWKES utilized WTB  
12 account information (xxxx-1336) to falsely and fraudulently represent that payment was  
13 authorized.

14 J.F.

15 50. Beginning in and around December 2012, TONYA MARIE STEWART and  
16 other co-conspirators unlawfully obtained Chase Bank account information of J.F.  
17 Thereafter, they falsely and fraudulently created, and caused to be created, counterfeit  
18 Chase Bank checks for their own use and benefit.

19 51. On or about December 16, 2012, TONYA MARIE STEWART falsely and  
20 fraudulently attempted to negotiate a counterfeit Chase Bank check, totaling \$546.12  
21 (#9964), in and around Spokane, WA. Among other material misrepresentations,  
22 TONYA MARIE STEWART utilized Chase Bank account information (xxxx-3545),  
23 including J.F.'s name, address, and bogus signature, to falsely and fraudulently represent  
24 that payment was authorized.

25 All in violation of 18 U.S.C. § 1349.



**COUNTS 2-63**  
**BANK FRAUD**  
**(18 U.S.C. § 1344)**

1  
2  
3 1. Paragraphs 1-40, of the General Allegations section of this Indictment are  
4 re-alleged and incorporated fully herein by reference.

5 2. From in or around August 2012 and continuing through in or around  
6 December 2012, the exact dates being unknown to the Grand Jury, in the Eastern District  
7 of Washington, and elsewhere, defendants KIMBERLY LEE FAWVER, SARA M.  
8 MURPHY, TONYA MARIE STEWART, ERIC D. RANGEL, DANIELLE CHRISTINE  
9 RANGEL, KAYLA JOY COSTELLO, AMY M. ALTONA, STEVEN EDWIN  
10 BRONOWSKI, ANTHONY D. GARITONE, PAMELA SUEANNE HAWKES,  
11 ANTHONY R. GALLO, PHILLIP E. THORN, LAYLA MARIE HENDERSON, GARY  
12 DOUGLAS DIBBLE, CAMBREA M. BISHOP, DARYLE ROCHELLE WALLETTE,  
13 and SAMANTHA LAVELLE SMITH, did knowingly, and with intent to defraud,  
14 execute, and attempt to execute, and cause the execution of, a scheme and artifice to  
15 defraud one or more financial institutions, as defined by 18 U.S.C. § 20, which scheme  
16 and artifice employed a material falsehood, and did knowingly, and with intent to  
17 defraud, execute, and attempt to execute, and cause the execution of, a scheme and  
18 artifice to obtain moneys, funds, credits, assets, and other property owned by, and under  
19 the custody and control of one or more said financial institutions by means of false and  
20 fraudulent pretenses, representations, and promises, relating to a material fact, in  
violation of 18 U.S.C. §§ 1344(1) and (2), and 2.

21 **PURPOSE OF THE SCHEME AND ARTIFICE**

22 3. It was the purpose of the scheme and artifice for the defendants and their  
23 accomplices to unlawfully enrich themselves by, among other things: (a) unlawfully  
24 obtaining, via theft, burglary, and other means, financial institution account data and  
25 other identifying information of real person and organizational victims; (b) creating  
26 counterfeit checks, utilizing financial institution account and routing data and other  
27 identifying information of real person and organizational victims, materially

misrepresenting authorized payments to the defendants, their accomplices, and others; (c) recruiting and utilizing check runners to negotiate the counterfeit checks at various locations and return the proceeds to be divided amongst the participants; (d) causing the counterfeit checks to be presented for payment by the financial institutions based on the material misrepresentations; (e) unlawfully utilizing means of identification of real person victims and others, in order to conceal the defendants' and their accomplices' involvement in the fraud scheme; and (f) diverting the fraud proceeds for their personal use and benefit, all to further the fraud scheme.

#### THE SCHEME AND ARTIFICE

Paragraphs 4 through 51 of the Manner and Means section of Count 1 of the Indictment are re-alleged and incorporated by reference as though fully set forth herein as a description of the scheme and artifice.

#### EXECUTION OF THE SCHEME AND ARTIFICE

4. On or about the dates specified as to each count below, in Spokane County, in the Eastern District of Washington, and elsewhere, the defendants specified as to each count below did execute and attempt to execute the aforesaid scheme and artifice to defraud a financial institution and to obtain any moneys, funds, credit, assets, and other property owned by, and under the custody and control of, said financial institution, as more particularly described below:

<u>COUNT</u>	<u>APPX. DATES</u>	<u>DEFENDANT(S)</u>	<u>EXECUTION OF THE SCHEME &amp; ARTIFICE</u>
2	9/11/12	ERIC D. RANGEL, DANIELLE CHRISTINE RANGEL, and ANTHONY D. GARITONE	Creation and submission of counterfeit Sterling Savings check (account xxxx-1241), in the amount \$300.00, for payment at Numerica Credit Union.

<u>COUNT</u>	<u>APPX. DATES</u>	<u>DEFENDANT(S)</u>	<u>EXECUTION OF THE SCHEME AND ARTIFICE</u>
3	9/11/12	ERIC D. RANGEL, DANIELLE CHRISTINE RANGEL, and ANTHONY D. GARITONE	Creation and submission of counterfeit Sterling Savings check (account xxxx-1241), in the amount \$350.00, for payment at Numerica Credit Union.
4	9/11/12	ERIC D. RANGEL, DANIELLE CHRISTINE RANGEL, and ANTHONY D. GARITONE	Creation and submission of counterfeit Sterling Savings check (account xxxx-1241), in the amount \$500.00, for payment at Numerica Credit Union.
5	9/11/12	ERIC D. RANGEL, DANIELLE CHRISTINE RANGEL, and ANTHONY D. GARITONE	Creation and submission of counterfeit Sterling Savings check (account xxxx-1241), in the amount \$1,100.00, for payment at Numerica Credit Union.
6	9/12/12	ERIC D. RANGEL, DANIELLE CHRISTINE RANGEL, and ANTHONY D. GARITONE	Creation and submission of counterfeit Sterling Savings check (account xxxx-1241), in the amount \$1,000.00, for payment at Numerica Credit Union.
7	9/14/12	DANIELLE CHRISTINE RANGEL, and ANTHONY D. GARITONE	Submission of Fifth Third Bank check (account xxxx-5780), in the amount \$1,387.00, for payment at Numerica Credit Union.

<b><u>COUNT</u></b>	<b><u>APPX. DATES</u></b>	<b><u>DEFENDANT(S)</u></b>	<b><u>EXECUTION OF THE SCHEME AND ARTIFICE</u></b>
8	9/18/12	ERIC D. RANGEL, and ANTHONY D. GARITONE	Submission of Fifth Third Bank check (account xxxx-5780) for payment at Numerica Credit Union.
9	9/28/12	KIMBERLY LEE FAWVER, and SAMANTHA LAVELLE SMITH	Creation and submission of counterfeit Riverbank check (account xxxx-1364), in the amount \$168.49, for payment at STCU.
10	9/26/12	KIMBERLY LEE FAWVER, and TONYA MARIE STEWART	Creation and submission of counterfeit Capitol One Bank check (account xxxx-2848), in the amount \$450.00, for payment at Chase Bank.
11	10/5/12	ERIC D. RANGEL, DANIELLE CHRISTINE RANGEL, and KAYLA JOY COSTELLO	Creation and submission of counterfeit WTB check (account xxxx-3227), in the amount \$1,100.00, for payment at WTB.
12	10/5/12	ERIC D. RANGEL, and DANIELLE CHRISTINE RANGEL	Creation and submission of counterfeit WTB check (account xxxx-3227), in the amount \$1,100.00, for payment.
13	10/5/12	ERIC D. RANGEL, and DANIELLE CHRISTINE RANGEL	Creation and submission of counterfeit WTB check (account xxxx-3227), in the amount \$1,008.15, for payment.

<b><u>COUNT</u></b>	<b><u>APPX. DATES</u></b>	<b><u>DEFENDANT(S)</u></b>	<b><u>EXECUTION OF THE SCHEME AND ARTIFICE</u></b>
14	10/9/12	KIMBERLY LEE FAWVER, and ERIC D. RANGEL	Creation and submission of counterfeit U.S. Bank of Idaho check (account xxxx-5684), in the amount \$493.70, for payment.
15	10/11/12	ERIC D. RANGEL, DANIELLE CHRISTINE RANGEL, and ANTHONY R. GALLO	Creation and submission of counterfeit WTB check (account xxxx-6595), in the amount \$492.34, for payment.
16	10/11/12	ERIC D. RANGEL, DANIELLE CHRISTINE RANGEL, and LAYLA MARIE HENDERSON	Creation and submission of counterfeit WTB check (account xxxx-9455), in the amount \$536.00, for payment.
17	10/13/12	ERIC D. RANGEL, DANIELLE CHRISTINE RANGEL, and LAYLA MARIE HENDERSON	Creation and submission of counterfeit WTB check (account xxxx-6595), in the amount \$250.00, for payment.
18	10/11/12	KIMBERLY LEE FAWVER, and SARA M. MURPHY	Creation and submission of counterfeit WTB check (account xxxx-9205), in the amount \$250.00, for payment.
19	10/12/12	KIMBERLY LEE FAWVER, and DARYLE ROCHELLE WALLETTE	Creation and submission of counterfeit WTB check (account xxxx-9205), in the amount \$150.00, for payment.
20	10/14/12	KIMBERLY LEE FAWVER, and TONYA MARIE STEWART	Creation and submission of counterfeit WTB check (account xxxx-9205), in the amount \$150.00, for payment.

<b><u>COUNT</u></b>	<b><u>APPX. DATES</u></b>	<b><u>DEFENDANT(S)</u></b>	<b><u>EXECUTION OF THE SCHEME AND ARTIFICE</u></b>
21	10/15/12	KIMBERLY LEE FAWVER, and CAMBREA M. BISHOP	Creation and submission of counterfeit WTB check (account xxxx-9205), in the amount \$515.36, for payment.
22	10/17/12	TONYA MARIE STEWART	Creation and submission of counterfeit Wells Fargo check (account xxxx-6176), in the amount \$48.96, for payment.
23	10/18/12	TONYA MARIE STEWART	Creation and submission of counterfeit Wells Fargo check (account xxxx-6176), in the amount \$51.55, for payment.
24	10/18/12	TONYA MARIE STEWART	Creation and submission of counterfeit Wells Fargo check (account xxxx-6176), in the amount \$63.89, for payment.
25	10/19/12	TONYA MARIE STEWART	Creation and submission of counterfeit Wells Fargo check (account xxxx-6176), in the amount \$204.95, for payment.
26	10/19/12	SARA M. MURPHY, and TONYA MARIE STEWART	Creation and submission of counterfeit Wells Fargo check (account xxxx-6176), in the amount \$82.07, for payment.



<u>COUNT</u>	<u>APPX. DATES</u>	<u>DEFENDANT(S)</u>	<u>EXECUTION OF THE SCHEME AND ARTIFICE</u>
27	10/19/12	SARA M. MURPHY	Creation and submission of counterfeit Wells Fargo check (account xxxx-6176), in the amount \$161.31, for payment.
28	10/21/12	SARA M. MURPHY	Creation and submission of counterfeit U.S. Bank check (account xxxx-4552), in the amount \$72.15, for payment.
29	10/21/12	SARA M. MURPHY	Creation and submission of counterfeit U.S. Bank check (account xxxx-4552), in the amount \$60.47, for payment.
30	10/21/12	SARA M. MURPHY	Creation and submission of counterfeit U.S. Bank check (account xxxx-4552), in the amount \$73.68, for payment.
31	10/21/12	SARA M. MURPHY	Creation and submission of counterfeit U.S. Bank check (account xxxx-4552), in the amount \$85.19, for payment.
32	10/22/12	SARA M. MURPHY	Creation and submission of counterfeit U.S. Bank check (account xxxx-4552), in the amount \$47.26, for payment.
33	10/22/12	SARA M. MURPHY	Creation and submission of counterfeit U.S. Bank check (account xxxx-4552), in the amount \$104.36, for payment.

<u>COUNT</u>	<u>APPX. DATES</u>	<u>DEFENDANT(S)</u>	<u>EXECUTION OF THE SCHEME AND ARTIFICE</u>
34	10/22/12	SARA M. MURPHY	Creation and submission of counterfeit U.S. Bank check (account xxxx-4552), in the amount \$56.94, for payment.
35	10/22/12	SARA M. MURPHY	Creation and submission of counterfeit U.S. Bank check (account xxxx-4552), in the amount \$64.28, for payment.
36	10/23/12	PHILLIP E. THORN	Creation and submission of counterfeit U.S. Bank check (account xxxx-4552), in the amount \$350.00, for payment.
37	10/24/12	TONYA MARIE STEWART	Creation and submission of counterfeit U.S. Bank check (account xxxx-4552), in the amount \$61.29, for payment.
38	10/21/12	TONYA MARIE STEWART	Creation and submission of counterfeit Panhandle State Bank check (account xxxx-6966), in the amount \$59.31, for payment.
39	10/21/12	TONYA MARIE STEWART	Creation and submission of counterfeit Panhandle State Bank check (account xxxx-6966), in the amount \$69.19, for payment.

<u>COUNT</u>	<u>APPX. DATES</u>	<u>DEFENDANT(S)</u>	<u>EXECUTION OF THE SCHEME AND ARTIFICE</u>
40	10/21/12	GARY DOUGLAS DIBBLE	Creation and submission of counterfeit Panhandle State Bank check (account xxxx-6966), in the amount \$59.19, for payment.
41	10/29/12	KIMBERLY LEE FAWVER	Creation and submission of counterfeit Mountain West Bank check (account xxxx-9632), in the amount \$41.27, for payment.
42	11/18/12	KIMBERLY LEE FAWVER, and PAMELA SUEANNE HAWKES	Creation and submission of counterfeit Mountain West Bank/BoA check (account xxxx-9632), in the amount \$55.00, for payment.
43	11/20/12	KIMBERLY LEE FAWVER, and PAMELA SUEANNE HAWKES	Creation and submission of counterfeit Mountain West Bank/BoA check (account xxxx-9632), in the amount \$74.00, for payment.
44	11/21/12	KIMBERLY LEE FAWVER, and PAMELA SUEANNE HAWKES	Creation and submission of counterfeit Mountain West Bank/BoA check (account xxxx-9632), in the amount \$70.00, for payment.
45	11/21/12	KIMBERLY LEE FAWVER, and PAMELA SUEANNE HAWKES	Creation and submission of counterfeit Mountain West Bank/BoA check (account xxxx-9632), in the amount \$1,700.00, for payment.

<b><u>COUNT</u></b>	<b><u>APPX. DATES</u></b>	<b><u>DEFENDANT(S)</u></b>	<b><u>EXECUTION OF THE SCHEME AND ARTIFICE</u></b>
46	11/23/12	KIMBERLY LEE FAWVER, and PAMELA SUEANNE HAWKES	Creation and submission of counterfeit Mountain West Bank/BoA check (account xxxx-9632), in the amount \$80.00, for payment.
47	10/29/12	KIMBERLY LEE FAWVER, and STEVEN EDWIN BRONOWSKI	Creation and submission of counterfeit Panhandle State Bank check (account xxxx-0083), in the amount \$587.90, for payment.
48	10/29/12	KIMBERLY LEE FAWVER, and STEVEN EDWIN BRONOWSKI	Creation and submission of counterfeit Panhandle State Bank check (account xxxx-0083), in the amount \$300.00, for payment.
49	11/5/12	KAYLA JOY COSTELLO	Creation and submission of counterfeit American West Bank check (account xxxx-1268), in the amount \$500.00, for payment at Wells Fargo.
50	11/15/12	KIMBERLY LEE FAWVER, and PAMELA SUEANNE HAWKES	Creation and submission of counterfeit WTB check (account xxxx-4964), in the amount \$850.00, for payment at WTB.
51	11/19/12	DANIELLE CHRISTINE RANGEL, and AMY M. ALTONA	Creation and submission of counterfeit Riverbank check (account xxxx-0124), in the amount \$55.47, for payment.

<b><u>COUNT</u></b>	<b><u>APPX. DATES</u></b>	<b><u>DEFENDANT(S)</u></b>	<b><u>EXECUTION OF THE SCHEME AND ARTIFICE</u></b>
52	11/19/12	DANIELLE CHRISTINE RANGEL, and AMY M. ALTONA	Creation and submission of counterfeit Riverbank check (account xxxx- 0124), in the amount \$281.77, for payment.
53	11/19/12	DANIELLE CHRISTINE RANGEL, and AMY M. ALTONA	Creation and submission of counterfeit Riverbank check (account xxxx- 0124), in the amount \$97.81, for payment.
54	11/20/12	ERIC D. RANGEL, DANIELLE CHRISTINE RANGEL, AMY M. ALTONA, and ANTHONY D. GARITONE	Creation and submission of counterfeit Riverbank check (account xxxx- 0124), in the amount \$328.86, for payment.
55	11/20/12	ERIC D. RANGEL, DANIELLE CHRISTINE RANGEL, AMY M. ALTONA, and ANTHONY D. GARITONE	Creation and submission of counterfeit Riverbank check (account xxxx- 0124), in the amount \$157.70, for payment.
56	11/20/12	DANIELLE CHRISTINE RANGEL, and AMY M. ALTONA	Creation and submission of counterfeit Riverbank check (account xxxx- 0124), in the amount \$106.41, for payment.
57	11/20/12	DANIELLE CHRISTINE RANGEL, and AMY M. ALTONA	Creation and submission of counterfeit Riverbank check (account xxxx- 0124), in the amount 71.81, for payment.
58	11/20/12	ERIC D. RANGEL, DANIELLE CHRISTINE RANGEL, AMY M. ALTONA, and ANTHONY D. GARITONE	Creation and submission of counterfeit Riverbank check (account xxxx- 0124), in the amount \$341.68, for payment.

<b><u>COUNT</u></b>	<b><u>APPX. DATES</u></b>	<b><u>DEFENDANT(S)</u></b>	<b><u>EXECUTION OF THE SCHEME AND ARTIFICE</u></b>
59	11/20/12	DANIELLE CHRISTINE RANGEL, and AMY M. ALTONA	Creation and submission of counterfeit Riverbank check (account xxxx- 0124), in the amount \$255.35, for payment.
60	11/21/12	DANIELLE CHRISTINE RANGEL, and AMY M. ALTONA	Creation and submission of counterfeit Riverbank check (account xxxx- 0124), in the amount \$330.42, for payment.
61	11/21/12	DANIELLE CHRISTINE RANGEL, and AMY M. ALTONA	Creation and submission of counterfeit Riverbank check (account xxxx- 0124), in the amount \$298.15, for payment.
62	11/8/12- 11/29/12	KIMBERLY LEE FAWVER, and PAMELA SUEANNE HAWKES	Creation and submission of counterfeit WTB check (account xxxx-1336), in the amount \$565.90, for payment.
63	12/17/12	TONYA MARIE STEWART	Creation and submission of counterfeit Chase Bank check (account xxx- 3545), in the amount \$546.12, for payment.

All in violation of 18 U.S.C. §§ 1344(1) and (2), and 2.



**COUNTS 64-86****AGGRAVATED IDENTITY THEFT  
(18 U.S.C. § 1028A(a)(1))**

On or about the dates set forth below, in the Eastern District of Washington, and elsewhere, defendants KIMBERLY LEE FAWVER, SARA M. MURPHY, TONYA MARIE STEWART, ERIC D. RANGEL, DANIELLE CHRISTINE RANGEL, KAYLA JOY COSTELLO, ANTHONY D. GARITONE, PAMELA SUEANNE HAWKES, ANTHONY R. GALLO, PHILLIP E. THORN, and GARY DOUGLAS DIBBLE, specified as to each count below, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, as specified below, during and in relation to bank fraud violations of 18 U.S.C. §§ 1349 and 1344, as alleged in Counts 1-7, 10-11, 14-15, 22-27, 36-41, and 49-50 of the Indictment:

<b><u>COUNT</u></b>	<b><u>APPX. DATES</u></b>	<b><u>DEFENDANT(S)</u></b>	<b><u>ACT IN EXECUTION</u></b>
64	9/11/12- 9/12/12	ERIC D. RANGEL, DANIELLE CHRISTINE RANGEL, and ANTHONY D. GARITONE	Transfer, possession, and use of M.H.C.'s name, address, Sterling Savings account information (account xxxx-1241), and forged signature during and in relation to Counts 1-6.
65	9/14/12	DANIELLE CHRISTINE RANGEL, and ANTHONY D. GARITONE	Transfer, possession, and use of J.N.'s name, address, and forged signature during and in relation to Counts 1 and 7.
66	9/26/12	KIMBERLY LEE FAWVER, and TONYA MARIE STEWART	Transfer, possession, and use of L.S.'s name, and forged signature during and in relation to Counts 1 and 10.

<b><u>COUNT</u></b>	<b><u>APPX. DATES</u></b>	<b><u>DEFENDANT(S)</u></b>	<b><u>ACT IN EXECUTION</u></b>
67	10/5/12	ERIC D. RANGEL, DANIELLE CHRISTINE RANGEL, and KAYLA JOY COSTELLO	Transfer, possession, and use of N.F.'s name, address, and WA identification/driver's license number during and in relation to Counts 1 and 11.
68	10/9/12	ERIC D. RANGEL	Transfer, possession, and use of C.T.'s name, address, WA identification/driver's license number, and forged signature during and in relation to Counts 1 and 14.
69	10/11/12	ERIC D. RANGEL, DANIELLE CHRISTINE RANGEL, and ANTHONY R. GALLO	Transfer, possession, and use of J.S.'s name, address, WA identification/driver's license number, and forged signature during and in relation to Counts 1 and 15.
70	10/17/12- 10/19/12	TONYA MARIE STEWART	Transfer, possession, and use of P.B.'s name, address, and Wells Fargo account information (xxxx-6176) during and in relation to Counts 1 and 22-26.

<u>COUNT</u>	<u>APPX. DATES</u>	<u>DEFENDANT(S)</u>	<u>ACT IN EXECUTION</u>
71	10/19/12	SARA M. MURPHY	Transfer, possession, and use of P.B.'s name, address, and Wells Fargo account information (xxxx-6176) during and in relation to Counts 1, 26, and 27.
72	10/23/12	PHILLIP E. THORN	Transfer, possession, and use of S.L.D.'s name, address, U.S. Bank account information (xxxx-4552), date of birth, and forged signature during and in relation to Counts 1 and 36.
73	10/24/12	TONYA MARIE STEWART	Transfer, possession, and use of S.L.D.'s name, address, U.S. Bank account information (xxxx-4552), and date of birth during and in relation to Counts 1 and 37.
74	10/21/12	TONYA MARIE STEWART	Transfer, possession, and use of H.C.T.'s name, address, and Panhandle State Bank account information (xxxx-6696) during and in relation to Counts 1, 38, and 39.
75	10/21/12	GARY DOUGLAS DIBBLE	Transfer, possession, and use of H.C.T.'s name, address, and Panhandle State Bank account information (xxxx-6696) during and in relation to Counts 1 and 40.

<b><u>COUNT</u></b>	<b><u>APPX. DATES</u></b>	<b><u>DEFENDANT(S)</u></b>	<b><u>ACT IN EXECUTION</u></b>
76	10/29/12	KIMBERLY LEE FAWVER	Transfer, possession, and use of J.W.'s name, WA identification/driver's license number, and forged signature during and in relation to Counts 1 and 41.
77	11/5/12	KAYLA JOY COSTELLO	Transfer, possession, and use of N.F.'s name and WA identification/driver's license number during and in relation to Counts 1 and 49.
78	11/5/12	KAYLA JOY COSTELLO	Transfer, possession, and use of C.P.'s name, address, American West Bank account information (xxxx-1268), and forged signature during and in relation to Counts 1 and 49.
79	11/15/12	KIMBERLY LEE FAWVER, and PAMELA SUEANNE HAWKES	Transfer, possession, and use of L.H.'s name and forged signature during and in relation to Counts 1 and 50.
80	11/19/12	KIMBERLY LEE FAWVER	Possession of L.N.N.'s name, address, and WA driver's license number and during and in relation to Count 1.

<b>COUNT</b>	<b>APPX. DATES</b>	<b>DEFENDANT(S)</b>	<b>ACT IN EXECUTION</b>
81	11/19/12	KIMBERLY LEE FAWVER	Possession of L.N.M.'s name and Social Security number during and in relation to Count 1.
82	11/19/12	KIMBERLY LEE FAWVER	Possession of J.R.P.'s name, address, WA driver's license number, and Social Security number during and in relation to Count 1.
83	11/19/12	KIMBERLY LEE FAWVER	Possession of M.M.'s name, address, and WA driver's license number during and in relation to Count 1.
84	11/19/12	KIMBERLY LEE FAWVER	Possession of E.A.'s name, address, and WA identification number during and in relation to Count 1.
85	11/19/12	KIMBERLY LEE FAWVER	Possession of M.M.C.'s name, address, and WA driver's license number during and in relation to Count 1.
86	11/19/12	KIMBERLY LEE FAWVER	Possession of J.S.'s name and Social Security number during and in relation to Count 1.

All in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

**NOTICE OF FORFEITURE ALLEGATIONS**

The allegations contained in Counts 1-86 of the Indictment are hereby realleged and incorporated herein by this reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 981(a)(1)(C), 28 U.S.C. § 2461(c), and 18 U.S.C. § 982(a)(2).

Upon conviction of any of the offenses in Counts 1-86, in violation of 18 U.S.C. §§ 1349, 1344, and 1028A, Defendants KIMBERLY LEE FAWVER, SARA M. MURPHY, TONYA MARIE STEWART, ERIC D. RANGEL, DANIELLE CHRISTINE RANGEL, CHRISTOPHER SCOTT BOUCK, KAYLA JOY COSTELLO, AMY M. ALTONA, STEVEN EDWIN BRONOWSKI, ANTHONY D. GARITONE, PAMELA SUEANNE HAWKES, ANTHONY R. GALLO, PHILLIP E. THORN, LAYLA MARIE HENDERSON, GARY DOUGLAS DIBBLE, CAMBREA M. BISHOP, DARYLE ROCHELLE WALLETTE, and SAMANTHA LAVELLE SMITH (hereinafter "the Defendants") shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses, all pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) and 18 U.S.C. § 982(a)(2). The property to be forfeited includes, but is not limited to, the following:

**MONEY JUDGMENT**

A sum of money equal to \$25,956.80 in United States currency, representing the amount of proceeds obtained as a result of the conspiracy to commit bank fraud and bank fraud offenses for which the Defendants are jointly and severally liable.

If any of the property described above, as a result of any act or omission of any of the Defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

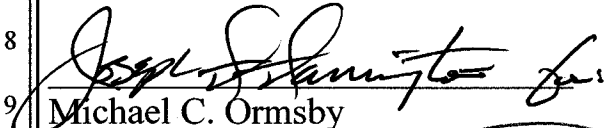


1 the United States shall be entitled to forfeiture of substitute property pursuant to 21  
2 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

3 All pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

4  
5 A TRUE BILL

6  
7 Foreperson

8  
9   
10 Michael C. Ormsby  
11 United States Attorney

12   
13 Sean T. McLaughlin  
14 Assistant United States Attorney  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27